

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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| <p>BILLY ELMORE,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,</p> <p>Defendants.</p> | <p>Court File No. 21-cv-01061 (NEB/ECW)</p> |
| <p>BRIAN SUPENIA,</p> <p>Plaintiffs,</p> <p>v.</p> <p>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,</p> <p>Defendants.</p> | <p>Court File No. 21-cv-01062 (PJS/ECW)</p> |
| <p>MARK BLIVEN, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>3M COMPANY and<br/>AEARO TECHNOLOGIES LLC,</p> <p>Defendants.</p>  | <p>Court File No. 21-cv-00908 (JRT/KMM)</p> |

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| <p>DAVID GAMWELL,</p> <p>Plaintiffs,</p> <p>v.</p> <p>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,</p> <p>Defendants.</p>    | <p>Court File No. 21-cv-01063 (SRN/KMM)</p> |
| <p>MARY TROWER,</p> <p>Plaintiffs,</p> <p>v.</p> <p>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,</p> <p>Defendants.</p>      | <p>Court File No. 21-cv-01064 (WMW/BRT)</p> |
| <p>MATTHEW McDONALD,</p> <p>Plaintiffs,</p> <p>v.</p> <p>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,</p> <p>Defendants.</p> | <p>Court File No. 21-cv-01065 (MJD/TNL)</p> |

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| <p>PAUL KIRK,</p> <p>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,</p> <p>Defendants.</p>                                     | <p>Court File No. 21-cv-01066 (PJS/DTS)</p> |
| <p>ROBERT RICHMOND,</p> <p>Plaintiffs,</p> <p>v.</p> <p>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,</p> <p>Defendants.</p>  | <p>Court File No. 21-cv-01067 (NEB/TNL)</p> |
| <p>WILLIAM McDONALD,</p> <p>Plaintiffs,</p> <p>v.</p> <p>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,</p> <p>Defendants.</p> | <p>Court File No. 21-cv-01068 (ECT/DTS)</p> |

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| <p>MARVIN CATES,<br/>Plaintiffs,<br/>v.<br/>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,<br/>Defendants.</p>  | <p>Court File No. 21-cv-01106 (JRT/KMM)</p> |
| <p>JOAN PILGREEN,<br/>Plaintiffs,<br/>v.<br/>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,<br/>Defendants.</p> | <p>Court File No. 21-cv-01107 (DWF/HB)</p>  |
| <p>MICKEY SELF,<br/>Plaintiffs,<br/>v.<br/>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,<br/>Defendants.</p>   | <p>Court File No. 21-cv-01108 (DSD/KMM)</p> |

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| <p>HAROLD WEST,<br/>v.<br/>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,<br/>Defendants.</p>  | <p>Plaintiffs,<br/>Court File No. 21-cv-01109 (DSD/ECW)</p> |
| <p>DON FIRMIN,<br/>v.<br/>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,<br/>Defendants.</p>   | <p>Plaintiffs,<br/>Court File No. 21-cv-01110 (JRT/BRT)</p> |
| <p>AUDIE GADDIS,<br/>v.<br/>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,<br/>Defendants.</p> | <p>Plaintiffs,<br/>Court File No. 21-cv-01111 (NEB/DTS)</p> |

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| <p>BONNIE SMITH,<br/>Plaintiffs,<br/>v.<br/>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,<br/>Defendants.</p> | <p>Court File No. 21-cv-01112 (JRT/HB)</p> |
| <p>JOE WILSON,<br/>Plaintiffs,<br/>v.<br/>SYNGENTA CROP PROTECTION,<br/>LLC., SYNGENTA AG, SYNGENTA<br/>SEEDS, LLC, CHEVRON U.S.A., INC.,<br/>and CHEVRON PHILLIPS CHEMICAL<br/>COMPANY LP,<br/>Defendants.</p>   | <p>Court File No. 21-cv-01113 (SRN/HB)</p> |

**PLAINTIFFS' MOTION FOR CONSOLIDATION OF ACTIONS**

Plaintiffs, by and through counsel, hereby move this Court for an order consolidating these cases to District of Minnesota.

This motion is based on the pleadings, files and records herein, including Plaintiffs' Memorandum for Appointment of Single Judge in Minnesota, filed in support of this Motion.

Dated: May 7, 2021

Respectfully submitted,

s/Daniel E. Gustafson  
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